

STATE OF NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
18 CVS 014001

COMMON CAUSE, et al.

PLAINTIFFS,

v.

Representative DAVID R. LEWIS,  
In his official capacity as Senior  
Chairman of the House Select  
Committee on Redistricting, et al.,

DEFENDANTS.

2018 AUG 30 P 3:57  
WAKE CO. S.C.  
B-1

**MOTION FOR REVIEW OF CERTIFIED COPIES OF NUECES COUNTY DOCUMENTS**

NOW COMES Nueces County, a non-party to the above-referenced matter, and makes and files this Motion for Review of Certified Copies of Nueces County Documents, and would show:

1. After August 20, 2019, Nueces County Judge Barbara Canales received a letter ("Letter") dated August 20, 2019 from Robert Hunter (of the law firm Higgins Benjamin). The Letter is attached hereto as Exhibit 1.
2. The Letter recites that a review of the "Hofeller Files" has apparently revealed documents belonging to Nueces County. Nueces County is one of two hundred fifty-four counties in the State of Texas.
3. The Letter recites that the Higgins Benjamin law firm "cannot show [Nueces County] these files or describe their content because [the files] are currently designated under a protective order."

4. The Letter suggests that Nueces County file a motion to seek leave to review its files.

5. This motion is filed to request that certified copies of all files thought to belong to Nueces County be provided to Nueces County Judge Barbara Canales for her review.<sup>1</sup>

6. Non-party Nueces County further moves that this Court enter an Order that no original documents which belong to Nueces County be destroyed or altered without a notice to Nueces County and an opportunity to be heard.

7. Non-party Nueces County further moves that the certified copies of documents which appear to be or are the property of Nueces County be produced within ten days from the day of this Motion.

WHEREFORE, non-party Nueces County moves that this Motion be granted and that certified copies of documents belonging to Nueces County be provided to County Judge Barbara Canales within ten days of this motion, that no original documents which belong to Nueces County be destroyed or altered without a notice to Nueces County and an opportunity to be heard; and for such other and further relief to which Nueces County may be justly entitled.

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<sup>1</sup> Inasmuch as Nueces County Judge Barbara Canales and the four (4) other County Commissioners have not yet seen the files, Nueces County takes no position by the filing of this motion as to the confidentiality of the documents in the files.

This the 30 day of August, 2019.

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *MOTION FOR REVIEW OF CERTIFIED COPIES OF NUECES COUNTY DOCUMENTS* was served upon all parties by email and U.S. mail to the following:

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This the 30 day of August, 2019.

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